



**CHICAGO PUBLIC SCHOOLS**

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**Paul G. Vallas**  
Chief Executive Officer

April 18, 2001

Federal Communications Commission  
Commissioner Michael K. Powell, Chairman  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554  
Attn: Office of the Secretary

Re: ET Docket 00-258  
Final Report "Spectrum Study of 2500-2690 MHz Band: the Potential for  
Accommodating Third Generation Mobile Systems"  
(Filed Via Electronic Comment Filing System)

Dear Chairman Powell:

On behalf of the Chicago Public Schools -- an urban school district serving more than 430,000 students -- we respectfully submit our comments on the Final Report "Spectrum Study of 2500-2690 MHz Band: the Potential for Accommodating Third Generation Mobile Systems."

We commend the March 30, 2001, Final Report. In the 1960's, the FCC set aside the frequencies between 2500 and 2690 MHz for use by schools and universities, allowing them to apply for an Instructional Television Fixed Service (ITFS) license. The Final Report acknowledges that deployment of both third generation mobile (3G) and fixed wireless broadband systems in the ITFS spectrum would provide considerable benefit to prospective users and the national economy. However, the report concludes that implementation of either the segmentation or relocation options analyzed in the band study would significantly affect ITFS and Multipoint Distribution Service (MDS) deployment and impose considerable costs on both private entities and the public. In addition, segmentation would require considerable time and costs to reengineer and deploy systems utilizing much less spectrum than is now allotted. Moreover, delivery of fixed wireless broadband services to the public and educational users would be delayed and may never be realized in rural areas or smaller markets. Furthermore, relocation would require considerable time and costs to reengineer and deploy systems in alternate frequency bands; delivery of service would again be delayed or never realized. Finally, the relocation option would require other services to relocate, and the time and costs to move those additional services would be significant.

CPS does not currently have an ITFS license, but we are seriously considering applying for a license if and when the opportunity to do so arises again. Traditionally, ITFS has been used by school districts for video programming and professional development. However, ITFS is on the brink of expanding its capabilities to provide broadband wireless Internet access and high-speed data transmission. Because 85 percent of CPS students come from low-income families, new ITFS broadband wireless service would help bridge the digital divide in our district. In addition, broadband wireless technology would help jump-start CPS' interactive videoconferencing distance learning program. As in the case of other districts, CPS would explore partnering with commercial MDS providers to lease excess capacity, which would allow the new technology to pay for itself.

Any significant change or limitation on spectrum allocated by the FCC to ITFS/MDS licenses would damage not only longstanding educational services, but also deny the opportunity to reap the future benefits of broadband wireless service to districts like CPS, which hope to one day enjoy the advantages conferred by an ITFS license.

Thank you for the opportunity to submit our comments.

Very truly yours,

Paul G. Vallas  
Chief Executive Officer  
Chicago Public Schools

Cc: Gery J. Chico, President, Chicago Board of Education

PGV/dgs